

In the Matter of)
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Amendment of Part 90 of the Commission Rules) WP Docket No. 07-100
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Paragraph 4. Paging on Public Safety VHF Frequencies. Public safety agencies in Wisconsin have a long history of using paging on the voice channels. Most counties in Wisconsin use two tone paging on VHF frequencies in some fashion. These departments use paging on their primary voice channels, which are shared by multiple departments for their day to day primary operations. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, alerting call back personnel for station coverage and making announcements of interest to other surrounding departments or for their personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to these departments. The FCC acknowledges that “paging and voice operations can generally co-exist on the same channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting.” Loss of this paging capability would be a financial burden for them to bear to implement another method for their alerting needs.

High volume paging should not be allowed on VHF base/mobile and mobile frequencies that are not specifically designated for paging. Paging on mutual aid channels should not be allowed unless specifically approved in the state plan.

Paragraph 5. The fire service has a long history of using paging on the voice channels. The Mutual Aid Box Alarm System (MABAS) has designated two primary VHF voice channels (154.265 MHz and 154.3025 MHz) for statewide interoperable communications for mutual aid purposes. The primary means of alerting fire departments statewide of a mutual aid emergency is using paging tones on these frequencies. Every increase in alarm and even the striking out of the box or extra alarm incidents is preceded by the activation of the statewide tones on the voice channel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the fire service in Illinois. The FCC acknowledges that “paging and voice operations can generally co-exist on the same channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting.” The loss of the paging capability would be devastating to a mutual aid system that has continued to grow since its inception in 1969, to where it has expanded from Illinois into surrounding states (Wisconsin, Indiana and Iowa). There is no simple solution to replace this tried and true method of alerting the hundreds of fire and EMS departments across this state in the event of an emergency that out strips any one department’s capacity to handle.

Paragraph 6. The fire service in Wisconsin has a long history of using paging on the voice channels. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, alerting call back personnel for station coverage and making announcements of interest to surrounding departments or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the emergency services in Wisconsin. In a majority of cases the paging is used by a large portion of the volunteer departments that would find it financially impossible to implement other more costly commercial based systems that are less effective for alerting their members. The increased cost of commercial systems would also impact the smaller full time departments that use RF paging.

Paragraph 7. Cross-Banding. We support the proposal to specifically state that cross-band repeaters are permitted for all public safety systems. Cross-band operation is an important operational and interoperability capability that is used by many public safety agencies.

Paragraph 8. Mobile Repeaters. We support the conclusion that restricting mobile repeaters to low power channels is no longer necessary. Greater flexibility in the assignment of frequencies will allow the necessary systems to be implemented.

Paragraph 10. Expired Licenses. Once a license is in expired status, those frequencies associated with that expired license should be available for frequency coordination and licensing.

Paragraph 11. Multiple Licensing. We believe the multiple licensing option should be retained for those that may wish to license in this manner.

Paragraph 12. Transit Systems and Toll Roads. Privately operated transit systems and toll roads wishing to operate on public safety frequencies should operate under a license that is issued to an appropriate sponsoring governmental entity.

Paragraph 14. Industrial/Business Pool Eligibility. Section 90.35 should be amended to state explicitly that governmental entities engaged in commercial enterprises are eligible for Industrial/Business Pool frequencies. Government surveying operations should also be permitted to license Industrial/Business Pool frequencies.

Paragraph 15. Disturbance of AM Broadcast Station Antenna Patterns. We suggest that any such rules changes are more appropriately made in Part 17.

Paragraph 16. FB8T Station Class. We believe that FB8T stations can continue to be permitted as long as the contour of the temporary station does not extend outside the contour of a FB8 station of the same licensee on the same frequency. Otherwise, they should be licensed at FBT or FB2T.

Paragraph 18. Reorganization of Part 90. We would support keeping the rules in Part 90 with a reorganization to reduce confusion and reduce regulatory burdens. We would encourage the consideration of merging Part 22 into Part 90 also due to the changes in the use of Part 22 frequencies and the need for more flexibility in the use of those frequencies.

Respectfully Submitted,

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